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March 7, 2000

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th St. S.W.
Washington, DC 20554

RECEIVED
MAR 07 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 99-200

Dear Ms. Salas:

On March 7, 2000, Randy Sanders and I, both representing BellSouth, met with Dorothy Attwood, Legal Advisor to Chairman Kennard, and Kyle Dixon, Legal Advisor to Commissioner Powell. The purpose of our meeting was to discuss what roles of the FCC, the states and industry guidelines should play in optimizing number resources used in the provision of telecommunications services. The attached document provided the basis for that discussion.

As required by Section 1.1206(b)(2) of the Commission's rules, I am filing two copies of this notice and ask that you place this notification in the record of the proceeding identified above. Thank you.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Dorothy Attwood (w/o attachment)
Kyle Dixon (w/o attachment)

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List ABCDE

Number Resource Optimization

BellSouth Telecommunications

CC Docket 95-500

Agenda...

- FCC Role
- Role of States
- Role of States in Number Optimization

Needed FCC Direction in Number Optimization...

- INC's 1K Pooling Guidelines
 - Service providers are responsible for pooling
 - Guidelines provide fundamental decisions on how pooling will work
- Cost Recovery
 - Pooling costs are not rate specific
 - Pooling is number administration
 - Pooling benefits all carriers, including non pooling carriers
- Pooling Trials After 1st Qtr/2000 Should Use NPAC 3.0 Software
 - Carriers should implement pooling using the national standard.
 - Allow carriers using 2.0/1.4 software will not significantly extend

FCC Must Require Carriers to Upgrade to 10 Digit Dialing

Industry Numbering Committee Guidelines...

- Industry Developed Guidelines Much Better than Current Standard
 - Provide parameters for uniform implementation of pooling
 - Provide consistent framework to measure benefits of pooling
 - Guidelines can be modified if needed
- Industry Developed Guidelines Were Developed in an Open Forum By Numbering Experts
 - Ad Hoc changes by states to guidelines does not allow proper evaluation of change
 - States can and should attend INC meetings to propose changes
- State Health Systems Have No Authority By Proposing Changes to Industry Developed Guidelines Without Industry Input
 - Example: California and 20 other states to "conduct ... pooling trials in ... circumstances with ... and ... thousands-block pooling guidelines"

Number Pooling Implementation...

- Must Use Industry-Based Cost Allocation as the National Standard
- Should Use NPAC as the Basis for RDP
 - New trials using NPAC should not be allowed after 1st/Qtr 2000
- Should Not Be Implemented in NPAs That Will Exhaust in Less Than 12 Months
- Must Use a Phased-In Approach
 - A Uniform Schedule Among States Within the Same NPAC Region Must Be Agreed Upon by the State
 - Statewide Implementation is a Prerequisite to Cost Recovery

Role of States in Number Optimization...

- States Have a Role in Number Optimization But...
 - States Must Be Proactive in Addressing NPA Relief
 - States Must Examine Revenue Neutral Rate Center Consolidation
- Must Not Abdicate Their Obligation to Perform Timely NPA Relief
 - Rationing of Codes to Extend the Life of NPAs is not Optimization
- States Should Work With the Industry To Modify Guidelines
 - Existing 1k Guidelines Need Modification
 - NPA
 - NXX Codes

Blueprint for True Number Optimization...

- Service Providers Should Be Subject To Audits To Ensure Compliance
- The Commission Should Monitor And Accomplish The Work Accomplished By The NANC / NRO
- The Commission Should Work With State Commissions To Establish A Transition Plan To Mandatory Ten-Digit (10-D) Dialing
 - The Commission should encourage all carriers to allow 10-D "permissive"
 - The Commission should mandate 10-D dialing for all interstate calls
 - Mandatory 10-D dialing should be imposed whenever an NPA goes into service
- Local Area Numbers Should Adopt NPA Overlays as the Preferred Choice
- The Commission Should Be Implemented in a Proactive Manner